

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

EDITH PALOS,	§	
<i>Plaintiff</i>	§	
	§	
v.	§	CA: H-09-2798
	§	
UNIVERSITY OF TEXAS HEALTH	§	
SCIENCE CENTER HOUSTON,	§	TRIAL BY JURY DEMANDED
<i>Defendant</i>	§	

**PLAINTIFF’S OPPOSED MOTION TO EXTEND DEADLINES TO  
DESIGNATE EXPERT WITNESSES AND FILE EXPERT REPORTS**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiff, Edith Palos (“Plaintiff”), and makes this her opposed motion to extend the deadline to designate expert witnesses and file expert reports; and for good cause would show the following:

1. Plaintiff’s designation of expert witnesses and expert reports are due to be filed on July 19, 2010.
2. Plaintiff has been occupied for several weeks responding to Defendant, University of Texas Health Science Center Houston’s (“Defendant”) written discovery and preparing for Plaintiff’s deposition in this case, scheduled for July 21, 2010.
3. Further, Plaintiff’s counsel’s calendar has been inordinately full recently. In the past three weeks alone, Plaintiff’s counsel has had to respond to two (2)

motions for summary judgment in federal court, one in the Eastern District of Texas and one in the Southern District of Texas; attend and/or conduct three (3) depositions for a lawsuit in the 172nd District Court of Jefferson County, Texas; attend a telephone hearing on a Texas Workforce Commission unemployment appeal; and prepare for a three-day Texas Education Agency administrative termination hearing.

4. For these reasons, Plaintiff prays that her deadline to designate expert witnesses and file expert reports be extended two weeks, until August 2, 2010. For equity's sake, Plaintiff further prays that Defendant's deadline to designate expert witnesses and file expert reports be extended two weeks as well.

5. Defendant will not be prejudiced by this motion.

6. This motion is made not for delay but that justice be done in this matter.

Respectfully submitted,

WATTS & ASSOCIATES,

/S/ LW  
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*Attorney for Plaintiff*

**VERIFICATION**

I, Larry Watts, verify that the facts stated in the foregoing document are true and correct to my personal knowledge upon penalty of perjury.

/S/ LW  
\_\_\_\_\_  
Larry Watts

**CERTIFICATE OF CONFERENCE**

I, Larry Watts, certify that I attempted to confer with opposing counsel, Darren Gibson, via e-mail on July 19, 2010. At the time of filing of this document, I had not received a response from Darren Gibson. Therefore, I must presume Darren Gibson is opposed to this motion.

/S/ LW  
\_\_\_\_\_  
Larry Watts

**CERTIFICATE OF SERVICE**

I, Larry Watts, hereby certify that a true and correct copy of this document was served on opposing counsel via electronic filing with the clerk's CM/ECF system on this the 19th of July, 2010.

/S/ LW  
\_\_\_\_\_  
Larry Watts